

September 21, 2022

**VIA ECF**

The Honorable Brian M. Cogan  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: United States v. Thomas Barrack, et al., 1:21-cr-371 (BMC) (S-1)**

Dear Judge Cogan:

We write in response to the Government's letter concerning the slides that Mr. Barrack intends to use during today's opening statements. We were informed by counsel who appeared before the Court in the Court's last criminal trial it was acceptable to the Court to exchange any slides after the Government's opening, so as to not to prematurely reveal defense strategy before the Government opens. However, we will comply with the Government's request that we provide the slides before 9:30 AM this morning and the parties will raise any objections that cannot be resolved amongst counsel, before opening statements.

Respectfully submitted,

WILLKIE FARR & GALLAGHER LLP  
/s/ Michael S. Schachter  
Michael S. Schachter  
Randall W. Jackson  
Casey E. Donnelly  
Steven J. Ballew  
Jordan D. Reisch

O'MELVENY & MYERS LLP

James A. Bowman

*Counsel for Defendant*  
*Thomas J. Barrack, Jr.*

Cc (via ECF): Hiral D. Mehta  
Nathan Daniel Reilly  
Ryan C. Harris  
Samuel P. Nitze

57502859.1

Craig R. Heeren  
Matthew John McKenzie